Building an Effective Stormwater Funding Strategy

DRAFT Learning Module:

U.S. EPA Water Infrastructure and Resiliency Finance Center

Course Overview and Chapter 1:
- Introduction: The Need For Sustainable Funding
- Chapter 1: Prepare for Success: Get Organized and Build Support
- Chapter 2: Establish Your Program Goals, Your Key Problems, and Your Program Plan
- Chapter 3: Determine Your Present and Future Program Costs
- Chapter 4: Stormwater Revenue, Funding, and Financing Sources and Strategies
- Chapter 5: Developing and Administering a Dedicated Funding Source
- Chapter 6: Engaging Private Partners and Investors for Stormwater Management

Chapter 0- Course Introduction		
Slide no.	**Layout notes**	**Content**
1	Module title slide Text in Box EPA logo on bottom Above municipal infrastructure foto Table of contents with each chapter and chapter section titles listed on left throughout	**Building an Effective Stormwater Funding Strategy** This guide is intended for municipal stormwater program managers who are seeking to develop more stable long term program funding strategies. EPA logo below

2	List with links for each chapter
	
	NOTE: Slide jump numbers throughout will need to be edited when content complete.
		Building an Effective Stormwater Funding Strategy
		- Introduction: The Need For Sustainable Funding
		- Chapter 1: Prepare for Success: Get Organized and Build Support
		   ○ *Jump to Slide 3*
		- Chapter 2: Establish Your Program Goals, Your Key Problems, and Your Program Plan
		   ○ *Jump to Slide 22*
		- Chapter 3: Determine Your Present and Future Program Costs
		   ○ *Jump to Slide 33*
		- Chapter 4: Stormwater Revenue, Funding, and Financing Sources and Strategies
		   ○ *Jump to Slide 38*
		- Chapter 5: Developing and Administering a Dedicated Funding Source
		   ○ *Jump to Slide 53*
		- Chapter 6: Engaging Private Partners and Investors for Stormwater Management

3		**Introduction: The Need for Sustainable Funding** While municipal stormwater programs have made substantial progress, funding limitations hamper many programs' ability to take needed actions.

Chapter 0- Course Introduction		
Slide no.	Layout notes	Content
		However, many programs that need more funding have not developed the financial skills and plans necessary to succeed in obtaining stable, adequate funding or are unfamiliar with available funding sources and strategies. This course aims to help local stormwater programs understand how to surmount these challenges and build the skills necessary to obtain necessary funding. More resources are also available in the Water Finance Clearinghouse Funding Database. (LINK TO https://ofmpub.epa.gov/apex/wfc/f?p=165:1::::::)
4	Text w foto	**Course Layout** The course is divided into six stand-alone chapters. You are free to explore these in order or jump to the subject matter of greatest interest to you. We encourage you to study each chapter as experience has demonstrated that solid preparation and planning are key ingredients for success in building a sustainable stormwater finance strategy.
5	Text with links to italicized text (which links to detailed information under each italicized section NOTE: Where this format is used throughout the course, will need a "Return" button at the bottom of the text box to return reader to the master page.	**A Sustainable Funding Strategy for your Stormwater Program Can Be Achieved!** Communities that have been most successful in building robust stormwater programs supported by adequate funding have found a few keys to success: *Describe What Your Program Does and Needs to Do* - Develop detailed short and long-term program plans to inform sound financial planning *Develop a Thorough Funding Analysis and Plan to Obtain Durable Funding* - Establish thoughtful funding plans that carefully evaluate costs and different funding options to build a sustainable funding portfolio *Build Public and Decision-maker Support Before Asking for Funds* - Develop strong support for the program before seeking dedicated funds This course draws upon the experiences of peer programs to identify strategies to help you succeed—now let's get started!

Chapter 1: Prepare for Success: Get Organized and Build Support
- o   Subchapter 1.1: Prepare for a Funding Breakthrough
- o   Subchapter 1.2: Get Organized to Succeed- Plan to Seek the Funding You Need
- o   Subchapter 1.3: Build Public Understanding and Support for Your Program
- o   Subchapter 1.4: Get Ready to Implement

Chapter 1: Prepare for Success: Get Organized and Build Support		
Slide no.	Layout notes	Content
6	Chapter navigation slide Title with each subchapter on	**Chapter 1: Prepare for Success: Get Organized and Build Support** Subchapter 1.1: **Prepare for A Funding Breakthrough** o *Jump to Slide 6* • Subchapter 1.2: **Get Organized to Succeed- Plan to Seek the Funding You Need**

	separate "right arrow" link	o *Jump to Slide 10*
		• Subchapter 1.3: **Build Public Understanding and Support for Your Program**
		o *Jump to Slide 16*
		• Subchapter 1.4: **Get Ready to Implement**
		Jump to Slide 19

Subchapter 1.1: Prepare for A Funding Breakthrough

Subchapter 1.1: Prepare for A Funding Breakthrough		
Slide no.	**Layout notes**	**Content**
7	Subchapter Introduction - add waterbody foto	**1.1: Prepare for a Funding Breakthrough** Early program planning and public outreach and involvement are critical to success. Many cities have found that "jumping in" to a funding campaign without adequate preparation is unlikely to succeed. This chapter provides resources and advice to help prepare for success in securing program funding.
8	Subchapter navigation slide Title with each subchapter on separate "right arrow" link	**1.1 Prepare for a Funding Breakthrough** • 1.1.1 Why Do We Need A Different Approach to Stormwater Funding and Finance? o *Jump to Slide 7* • 1.1.2 Implementing the Alternative: Overcoming Barriers to Sustainable Stormwater Funding *Jump to Slide X* • 1.1.3 Case Study: Moving from Failure to Success in Palo Alto, CA *Jump to Slide 8*

9	Text with chart figure	**1.1.1 Why Do We Need A Different Approach to Stormwater Funding and Finance?**
		
		Many Moving Parts Changing Over Time
		Municipal stormwater programs have a challenging assignment- to develop and implement a diverse program with many moving parts.
		CHART Below of core program elements
		Core Program Elements
		    - Minimum measure program elements (LINK to https://www.epa.gov/npdes/stormwater-discharges-municipal-sources)
		    - Water Quality-Based elements (LINK to https://www.epa.gov/sites/production/files/2017-01/documents/part1-epa_compendium_of_ms4_general_permit_requirements_508.pdf)
		        - Additional elements addressing local priorities and service needs,
		        - Customer service, financial management, and administrative operations, and
		        - Monitoring, tracking, and reporting requirements.

10	Text with Stock Image (maybe a puzzle image?)	**Each Program (and Permit) Are Different** These program elements are usually tailored to fit state and local needs, issues, and preferences. This is a good thing because it enables states and local governments to focus programs to best address local priorities and interests. But this is also challenging because it makes the planning and funding process more difficult (i.e., there are no easy, general templates to follow).

Subchapter 1.1: Prepare for A Funding Breakthrough		
Slide no.	**Layout notes**	**Content**
11	Text with Stock Image	**Needs Change Over Time** To make things more challenging, permit requirements and local stormwater management issues change over time. For example, many MS4 permits now include requirements to address individual pollutants of concern and implement Total Maximum Daily Loads. Many states and communities also want to better integrate urban water management planning to address new opportunities and challenges (e.g., urban greening, water supply augmentation, and climate-related effects).
12	Text with stock image	**Program and Financial Planning Challenges** What are the key challenges local programs face in planning their program and financial futures?
13	Text	**Program Plans Are Incomplete and Responsibilities Spread Out** Many communities lack long term stormwater plans. Communities may have Stormwater Management Plans (SWMP) related the NPDES MS4 permit but these plans typically don't account for all aspects of program operation and/or anticipate future program needs. Stormwater management responsibilities are often spread across several programs with independent planning and budgeting processes, which makes it difficult to look comprehensively at stormwater program activities and needs. Many local programs lack staffing expertise and/or time necessary to prepare a long term stormwater implementation and funding plans. **(Chapter 2 discusses Long Term Stormwater planning needs and approaches in greater detail) ADD CH2 LINK**

14	Text with table, animated entry of each bullet	**Current Funding Is Usually Inadequate**
		Municipal stormwater programs are rarely funded at levels necessary to:
		TABLE BELOW,
		   - meet current and likely future regulatory requirements,
		   - maintain and improve local infrastructure, and
		   - attain future local goals.
		
		As a result, many communities face a great deal of deferred maintenance on local stormwater infrastructure and/or lower than desired service levels.

15	Text with table Animated entry of each bullet	**Current Funding Is Usually Unstable**
		Most local programs depend upon an unsteady mix of general funds and grants to fund capital, operations, and maintenance needs. This funding mix is rarely reliable and sustainable because:
		TABLE BELOW
		   - general funds are variable and subject to intense completion
		   - grants are unreliable, competitive, and require local matches, and
		   - access to other financing sources (loans, bonds, public-private partnerships, grants) normally require dedicated local funding to assure repayment or provide required match.
		
		Only about 1/3 of MS4 programs currently have dedicated funding sources!

Subchapter 1.1: Prepare for A Funding Breakthrough		
Slide no.	Layout notes	Content

	Text with animated entry of each sentence	**Embracing the Need to Change: A Dilemma**
		How do we improve our stormwater program plans and finance strategies when we barely have time to address urgent, everyday needs?
		
		Don't fall into the trap of being too busy to plan.
		
		Other municipal programs (e.g. wastewater and drinking water) usually have dedicated funding sources and organization. Stormwater programs deserve no less. Having dedicated funding is critical to building a sustainable program that:
		TABLE BELOW
		   - can repay/match loans, bonds, and grants,
		   - provide services customers expect, and
		   - meet regulatory and local water management needs.

16	Subchapter introduction slide	**1.1.2 Implementing the Alternative- Overcoming Barriers to Sustainable Stormwater Funding**

17	Text with bullet table, animated entry of each sentence.	**Challenges In Devising a Successful Stormwater Finance Plan**
		Developing a successful financial strategy is challenging because local programs often do not quite understand:
		TABLE BELOW
		   - all they own and do now,
		   - all they will need to do and build in the future,
		    - how much that work will cost (and when), and
		    - whether the public and key decision makers will support funding them at the levels they need to succeed.
		
		You are not alone!
		
		Other stormwater programs face the same challenges and many have overcome them.

18	Text with button links to more detailed explanations	**Key Elements For Success in Finance Planning** The key attributes of these successful models include: (phrases in italics below (this slide and next) linked to supporting text) *Careful advanced planning* Details are tailored to local needs, values, and constraints. Financial planning is based on sound, long term program planning that accounts for what you need to keep doing, and new activities and projects you will need to take on.

19	Text with button link to more detailed explanation	*Careful advance outreach and engagement*
		There is long term commitment to educating the public, stakeholders, and decision makers about:
		   - the benefits of sound stormwater management and costs of inaction (establishing need),
		   - your capability to make wise, accountable use of public funds (building trust), and
		   - your commitment to ensuring that fees/taxes are fair.

Subchapter 1.1: Prepare for A Funding Breakthrough		
Slide no.	**Layout notes**	**Content**
		(Text below may need to be on second page of supporting text for italicized topic above) Programs use multi-faceted communication and partnering tools to build political support. Opportunities are created for meaningful stakeholder involvement and engagement. Trusted local opinion leaders and outside experts help carry the message about the need for a strong program and adequate financing.

20	Text with points in bullet table	**Basic Steps In Planning, Seeking, and Implementing A Program Finance Strategy**
		Stormwater program and financial development models vary but follow a basic sequence:
		Table below
		   - *Get organized* and learn the basics about improved stormwater planning and finance
		   - *Assess* your goals, needs, costs, existing funding sources, and new financing options
		    - *Build support* before you ask for money
		    - *Ask for approval* of your funding proposal
		    - *Implement* with care and flexibility
		    - *Evaluate and adjust*

21	Text with table	**The Need for A Portfolio Approach To Funding**
		The focus of this training is on approaches for a community to develop a sustainable funding strategy You will likely need to assemble a mix of different types of funding to pay for:
		Table below
		   - one-time capital costs to build projects and buy durable equipment
		   - recurring costs to operate and maintain infrastructure, BMPs, and non-infrastructure program activities (e.g., inspections, public education)
		    - recurring costs of program administration and operations

22	Text with link	**Funding Sources Come With Strings** Many funding sources can only be used to fund certain types of work (for example loans and bonds can only fund capital projects and not operation and maintenance). Communities need to assemble funding portfolios including funding from different sources for different purposes. **Chapter 4 discusses different funding sources and how to assemble them in a portfolio approach ADD CH4 LINK**

23	Text with table	**Funders Are Looking For Similar Things**
		The strategies, skills, and approaches discussed in this course should help you persuade *all* potential funding sources that your program deserves their funding. Grantors, lenders, bond underwriters, and managers of general funds all look for similar things:
		Table below
		   - specific, well thought-out program plans
		   - reliability as financial managers to make good use of provided funds
		   - accountability to the funder and the public
		   - reliable sources of funding for loan/bond repayment or grant match.

Subchapter 1.1: Prepare for A Funding Breakthrough		
Slide no.	Layout notes	Content
24	Text	**Tailoring The Plan To Your Needs** Your specific planning and public involvement approaches will vary depending upon your mix of funding needs and sources, but following these strategies should help provide what your funders are expecting from you. Not every community can do each of these steps. But the more you work to incorporate these planning elements into your program, the more likely you will be to succeed.
25	Text	**Not a One Time Effort** It is important to see this process as continuing and sequential, not a one-time thing. Building a long term planning and adaptation process that aligns with your financial and budget planning process is key to developing the capacity to change your program strategies effectively over time. Implementing this type of program and finance planning model will improve the clarity and integrity of your program while increasing your chances for success now in obtaining a sustainable, dedicated financial portfolio.
26	Subchapter navigation slide with explanatory text (foto of Palo Alto)	**1.1.3 Case Study- Moving from Failure to Success in Palo Alto, CA** The City of Palo Alto, CA learned from its failure in 2000 to obtain dedicated stormwater program fees to mount successful fee measures in 2005 and 2017. Property owner fees were established in the late 1980s, but state law changed to require voter or property owner approval of stormwater fees. To succeed, the City would need to approval from its Council for a ballot measure, then to get a majority of votes from property owners. The City implemented several new approaches to build broader public support for its program and fee measures, learning from its mistakes in 2000. The 2017 fee measure passed with an approval of approximately 64% of voters, surpassing the 50% needed to be effective.
27	Text with links to italicized text (which links to detailed information under each italicized section	Reasons For Failure of 2000 Fee Campaign In 2000, the City sought approval of a revised stormwater fee program through a ballot mailed to property owners. Response was lackluster (53% response rate) and unsupportive (63% opposed, 37% support). City staff identified several factors that contributed to failure: *Poor Communication and Program Education* • Little focus on explaining why stormwater management is important or how the City operated a high-quality program • Little effort to document in advance tangible program accomplishments to date or specific project plans to be funded with new fee funds • Little direct outreach to elected officials led to tepid City Council support • Passive outreach strategy led to negative press coverage • Organized opposition emerged that City did not effectively counter *Fee Design* • Lack of "sunset" clause

		• Potential for uncontrolled inflationary fee increases *Public Involvement and Oversight* • Lack of provision for independent public oversight • Little opportunity for public involvement in developing and marketing the fee proposal • No concerted effort to involve local businesses or other opinion leaders in process
28	Text with links to italicized text (which links to detailed information under each italicized section	**Communication and Public Involvement in Later Fee Campaigns** Learning from its 2000 experience, the City of Palo Alto began to employ multiple communication, education and public involvement strategies: *Advisory Committee* - Convened a diverse Blue Ribbon Stormwater Committee of local stakeholders and leaders to work with city staff to review funding needs and to identify a funding mechanism. *More Persuasive Financial Analysis* - The Committee completed a financial analysis and provided recommendations and detailed project budget in a final report. (available at the City website https://www.cityofpaloalto.org/news/displaynews.asp?NewsID=3679) - City developed a widely-distributed Google map overlay of proposed and completed projects that were or will be funded by the fee. This enabled the public to understand specific projects funded by past fees and to be funded by the newly proposed fee. *Active Community Engagement* - Committee members actively engaged in communicating with the public and key elected officials, the business community, and other key stakeholder leaders though 15 public meetings - They discussed why the program was important and why continued dedicated fees were needed.
29	Text With Voting Image Text with links to italicized text (which links to detailed information under each italicized section	**Outreach Continued Until It Was Time To Vote** *Preparing To Ballot* The City included informational utility bill inserts to educate ratepayers, helping to build public trust that the City program was well managed and competent. An independent "Storm Drains for Palo Alto" committee was convened to provide campaign support. The committee privately fundraised $20,000, gathered endorsements, mailed campaign brochures, maintained a website, called likely voters, made presentations to local groups, and helped organize a debate about the fee measure. *Campaigning To Persuade* The City conducted a required fee protest hearing and involved senior council members and managers. This helped demonstrate that the City had nothing to

Subchapter 1.1: Prepare for A Funding Breakthrough		
Slide no.	Layout notes	Content
		hide and actively supported the fee measure. The City and campaign committee also conducted extensive outreach to the press (including presentation to editorial boards), which resulted in publication of several positive press articles describing the ballot measure as well as the value of stormwater management.
30	Text with image	**Lessons Learned** Palo Alto learned from its mistakes in 2000 that led to failure to maintain its fee program. The City took time to engage the public and decision makers, demonstrate the reliability of the local program to make wise use of funds, and build public trust in the program. As a result of its broader efforts to build support for its program and associated need for fees, Palo Alto's 2005 and 2017 fee ballot campaigns were each successful, with successively higher participation and approval rates. For more information about Palo Alto's fee program, see https://www.cityofpaloalto.org/news/displaynews.asp?NewsID=3679
31	Text with Portland ME image	**Another Success Story!** Between 2011 and 2016, the City of Portland, ME implemented a very successful strategy for introducing and obtaining approval of a dedicated fee funding program. Portland's experience illustrates the importance of thoughtful program planning and fee design, long term communication and public involvement, and building public trust that the program will spend its money wisely. More information about Portland's approach can be found here: http://neefc.org/index.php/projects/stormwater-financing?showall=&start=5

Subchapter 1.2: Get Organized to Succeed: Plan to Seek the Funding You Need

Subchapter 1.2: Get Organized to Succeed- Plan to Seek the Funding You Need		
Slide no.	Layout notes	Content
32	Subchapter title slide – image and navigation links	**1.2: Get Organized to Succeed- Plan to Seek the Funding You Need** • 1.2.1 Why We Need to Get Organized Up Front (jump to slide X) • 1.2.2 Define Your Existing Funding Situation (jump to slide y) • 1.2.3 The Long Term Stormwater Program Plan Leads to the Finance Plan (jump to slide z)

Subchapter 1.2: Get Organized to Succeed- Plan to Seek the Funding You Need		
Slide no.	Layout notes	Content

33	Text with table	**Why We Need to Get Organized Up Front**
		Some communities that have funding shortfalls jump directly to creating a fee or tax funding proposal backed by short-term public outreach to "sell" the funding campaign. *This strategy rarely works!* Instead, it is important to get organized and do some critical preliminary work <u>before</u> you will be ready to mount a successful fee funding campaign. Why?
		Place in table
		   - Helps you thoroughly articulate and assess your program purposes, activities, priorities, and assets
		   - Prepares you to explain why your work is critical, how you effectively do it, and why you need additional, dedicated funding
		    - Upfront planning is critical to building a reliable finance strategy—you can't identify how much you need until you can articulate what you need to do
		    - Teaches the public and key opinion leaders about the value sound stormwater management brings to a community
		    - Helps you identify key issues and concerns that will need to be addressed and key people who should be engaged when you mount your funding campaign in earnest

34	Image and text	**"You need to know where you are going before you can pay for the trip."** **- A MS4 Program Manager** Getting organized means defining your program status and operations plan. You need to be thorough in accounting for the entire program—even elements that may be managed from different departments. Many programs have organized their program plans based on the funding they can get, not on the funding they need. While this may seem realistic, it tends to institutionalize sub-par program design and implementation that limits your ability to achieve important long term goals. It's a chicken and egg issue: We cannot improve the program without more funding, but we cannot get more funding without articulating why we need to improve and how we should do it. **See Chapter 2 for detailed advice on how to develop a solid program plan (ADD CH2 LINK)**

35	Image and text and table	**Define your existing funding situation.**
		Based on the program plan developed above, you should summarize your existing funding situation:
		TABLE FORMAT
		       - Explain how you fund it now and how reliable those funding sources are.
		       - Provide an initial estimate of how much you need now and in the foreseeable future (e.g. identify and project current and future costs).
		       - Provide an initial funding gap estimate- How much more funding do you need to succeed?
		       - These initial funding assessments are critical to carrying out a more intensive funding feasibility and options assessment in the next main step.
		       - Chapters 3 and 4 provide more information about how to develop and present this element.

Subchapter 1.2: Get Organized to Succeed- Plan to Seek the Funding You Need		
Slide no.	**Layout notes**	**Content**
		Chapter 3 discusses methods for estimating costs in greater detail. (ADD CH3 LINK)
36	Text with Italicized text animated to appear second.	***But I Don't Know What I Spend Now*** Many cities have found that they do not have a clear, detailed picture of how much they actually spend on different program activities. This is particularly true in smaller communities where only a few people have implementation responsibilities and funding comes from a single source. Similarly, many communities do not break out their budgets to show which funding sources fund different stormwater-related program elements. This makes it difficult to show the public and elected officials what current program investments specifically finance. *Tracking your spending, by funding source and type of activity, for at least 1 year prior to developing your new funding plan, will greatly assist telling your story.*
37	Text	**The Stormwater Program Plan Leads To the Funding Plan** By taking the time up front to prepare a detailed program plan, taking into account your current and future program activities and needs, you will set a sound foundation for evaluating your financial planning options and seeking the reliable funding you need.

Subchapter 1.3: Build Public Understanding and Support for Your Program

Subchapter 1.3: Build Public Understanding and Support for Your Program		
Slide no.	**Layout notes**	**Content**
38	Subchapter title slide – image and navigation links	**1.3: Building Public and Opinion Leader Understanding and Support** Before you will be ready to mount a serious funding campaign, you need to lay the groundwork with your stakeholders and decision makers. This section discusses why advance public education and involvement are critical to funding success and provides detailed guidance on how to do it. • Overview: Keys To Building The Support You Need (jump to next slide) • 1.3.1 How Stakeholder Engagement can Strengthen Support for Program Design: Comparison of Reading MA and Berkeley County, SC (jump to slide X) • 1.3.2 Retooling Public Outreach to Build Support (jump to slide y) • 1.3.3 Building Meaningful Public Involvement Habits (jump to slide z) • 1.3.4 Involving the General Public and Stakeholder Groups (jump to slide a) • 1.3.5 Case Study: Raleigh, NC's Stakeholder Involvement Process (jump to slide b) • 1.3.6 Attracting and Involving Program "Champions" (jump to slide c) • 1.3.7 When Are More or Less Intensive Public Involvement Efforts Needed ? (jump to slide d)
39	Text	**"You can invite me upfront to be a partner, or in the end to be a plaintiff."** Local stakeholder (quoted in EPA 2013)

Subchapter 1.3: Build Public Understanding and Support for Your Program		
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		You will likely need to do more than conduct marketing to persuade the public and decision makers to accept a new funding proposal. To be successful in persuading the public (and their elected representatives) to support your request for dedicated funding, you need to build within the community a sense of trust, competence, and legitimacy.

40	Text with links to italicized text (which links to detailed information under each italicized section	**Keys To Building Trust and "Legitimacy"**
		
		Connect With Values
		- Show how sound stormwater management supports the community's values and needs and is a necessary component of well-functioning local governance
		
		Demonstrate Your Competence
		  - Persuade the public that the stormwater program has a solid reputation for professionalism and effectiveness, and can be trusted to wisely spend public funds
		
		Involve Your Customer (for real)
		  - Meaningfully involve the public, key stakeholders and opinion leaders, and elected officials in planning your program
		
		Experience of successful and unsuccessful funding efforts shows that careful, early engagement and trust-building are keys to success.

41	Text with fotos of two cities (if we can find them)	**1.3.1 How Stakeholder Engagement can Strengthen Support for Program Design: Comparison of Reading MA and Berkeley County, SC** Let's compare how two municipalities handled stakeholder outreach and engagement. These two communities proposed flat residential fees to fund their stormwater programs, with different outcomes. The comparison illustrates the value of stakeholder engagement in program design.
42	Text	**Reading, MA's Experience** In Reading MA, a stakeholder advisory committee was convened during fee program design that included members who had served on other town boards (and were likely to be more politically influential) and who were knowledgeable about stormwater issues. The group extensively discussed the pros and cons of setting a fee based on actual impervious surface area, versus setting a flat fee. This process enabled the committee to weigh the efficiency of a flat fee structure compared to the ability of a variable fee structure to account for differences in land ownership and runoff characteristics. The committee concluded that collecting the data needed to properly set variable fees based on impervious surface would be expensive and time consuming. The committee ultimately recommended a flat fee proposed by the advisory committee at a Town Meeting. The proposal was adopted in large part because the committee effort was viewed as credible.
43	Text	**Berkeley County, SC's Experience** In contrast, Berkeley County, SC did not engage stakeholders in its program development and therefore did not have the opportunity to test and refine its proposed design with stakeholders. Staff developed a proposal in-house without extensive discussion with outside parties. When County staff brought the proposal to a public County Council meeting, they faced significant opposition by Council members and citizens who were

Slide no.	Layout notes	Content
		concerned the flat fee structure would not be fair, and did not take into account differences in property sizes, ownership and runoff characteristics. At every County Council meeting in which the proposal was discussed, questions and controversy escalated, ultimately leading to the Council's rejection of the proposal.
44	Text	**Lessons Learned** The Reading, MA approach enabled the city to work with stakeholders early in the process and demonstrate that citizen concerns were being considered in fee design before asking the community to approve a fee proposal. If the Berkeley County Engineering Department had established a stakeholder advisory committee, these types of issue might have been identified and resolved before its proposal was finalized and presented to the County Council for consideration. Source: EPA, 2013, p. 28, 30.

45	Text	**1.3.2 Retooling Public Outreach to Build Support**
		Regulated stormwater programs regularly implement public outreach and involvement activities pursuant to NPDES MS4 permit requirements. Many of those existing efforts focus on:
		    - raising public awareness about stormwater pollution problems (e.g. polluted runoff can kill fish and make beaches unsafe for swimming), and
		    - changing public behavior (e.g., don't put chemicals down storm drains).
		
		This Is Not Enough To Support Your Program's Funding Needs!

46	Text	**There's More To Public Involvement** You also need to publicize the role of the local program in managing stormwater and the benefits a strong local program delivers. Regular public outreach approaches will vary by community, but experience has shown that multipronged approaches to outreach are more likely to succeed than single methods. In the period leading up to seeking a dedicated funding source or increasing your fees, you may need to focus more effort on this type of involvement than traditional outreach designed to reduce polluting behaviors.

47	Text with table	**A Different Mindset About Public Education**
		Cities that have been successful in obtaining dedicated funding regularly cite the importance of working long in advance of a fee funding initiative to build a base of public understanding and support for what you do:
		TABLE FORM
		    - Why urban stormwater matters as a resource, problem, and opportunity
		    - Benefits of sound management (less trash, nicer streets and parks, cleaner water and beaches, increased water supply
		    - Costs of failure to act (flooding, infrastructure collapse, reduced quality of life and property values)
		    - How your program already delivers benefits and results, and
		    - Why additional resources may be needed to sustain program successes

48	Text	**Public Outreach and Involvement Requirements Can Be Adjusted**

Subchapter 1.3: Build Public Understanding and Support for Your Program		
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		Permitting regulations about public outreach are flexible, and there is room to modify the focus of program outreach and involvement efforts (P.G. Environmental, 2018). Many communities would like to change emphasis in public outreach approaches to focus more on the values the local program delivers now and should deliver in the future, and the need for additional dedicated funding to better manage stormwater in the community. Working with the permitting authority, you can modify your public participation activities to change focus more on building public understanding of and support for what you do. For example, in 2015, the San Francisco Bay Water Board indicated that it would be open to modifying public outreach and involvement provisions to enable local jurisdictions to target their efforts to build support for new funding initiatives. This does not mean *abandoning* traditional outreach to reduce polluting behavior, but it may mean changing the emphasis in your public education approach.
49	Text with links to italicized text (which links to detailed information under each italicized section	**Common Public Outreach Tools** Successful communities often use a mix of: *Written outreach* - bill inserts, pamphlets, fact sheets *Presentations* - in person appearances before neighborhood groups and council meetings *Public service announcements* - Radio, TV, newspaper notices about the cost of stormwater pollution and ways the community and public are addressing it *Social media posts* - posts about successful project implementation, emergencies, or desired behaviors). *Involvement in community events* - tabling at fairs, festivals, or parades *Outreach to schools* - Teaching events in schools, PTA meetings *Outreach to news media* - seeking coverage new project startups and successes, or damage to infrastructure from storms
50	Text	**Keep It Simple** Your messaging needs to be short and simple. Avoid jargon and acronyms. Use plain language. Surveys have shown that many stormwater programs use excessively complex language in their public outreach materials, which increases potential for the public to misunderstand the information presented and opportunities to develop opposition (WWTW, 2014).
51	Text	**Prepare Your "Elevator Speech"** Speak to your customer's values and priorities, and show how the services you provide are services they want and need. Prepare your "elevator speech."- All your messengers need to

Subchapter 1.3: Build Public Understanding and Support for Your Program		
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		be ready with a succinct, compelling argument to support and fund your program. Using specific examples of what you've already done and plan to do works better than general status reports and plans. To effectively make your pitch for funding, *start by discussing what needs to be done, and only then discuss how to fund it.*
52	Text with links to italicized text (which links to detailed information under each italicized section	**Other Keys To Success In Building Support for Your Program** *Do Your Homework* You will need to show that you have solid documentation showing that you have thought this through and have a cost-effective program and funding plans in mind. *Don't wait!* You should start or refocus outreach to build awareness about the need for sound stormwater management and your program's services *before or concurrent with* defining your program plan. Successful communities often cite a need to carry out focused public outreach to build public understanding and support *at least 2 years before* seeking approval of a specific fee funding plan. If you are not doing so already, you should focus at least part of your public outreach to build support for your program plan and the need to provide adequate, stable funding.
53	Text with bullets and links	**Sources of Public Outreach Materials** There are many existing, ready to use public outreach materials available for your use or adaptation; however, most of the materials focus on general outreach about stormwater management issues and opportunities—not on local program plans and needs: - EPA's Nonpoint Source Outreach Toolbox https://cfpub.epa.gov/npstbx/ - EPA's Getting in Step: Engaging and Involving Stakeholders in Your Watershed https://www.epa.gov/sites/production/files/2015-11/documents/stakeholderguide_0.pdf - Pennsylvania's MCM2: Public Involvement resource guide: https://www.dep.pa.gov/Business/Water/CleanWater/StormwaterMgmt/Stormwater/MCM/Pages/MCM-2-Public-Involvement.aspx - Minnesota's Stormwater Manual: MCM 2 Public Participation/Involvement https://stormwater.pca.state.mn.us/index.php?title=MCM_2_Public_Participation/Involvement - Washington Stormwater Center (http://www.wastormwatercenter.org/coordination) - Massachusetts DEP (https://www.mass.gov/guides/stormwater-outreach-materials-to-help-towns-comply-with-the-ms4-permit)
54	Text	**1.3.3 Building Meaningful Public Involvement Habits** It is not enough to do broad outreach and education; studies and experience have shown that success in building support also requires 2-way engagement with program customers and decision makers and really ***involving them*** in your planning work. These people can help you in many ways.

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55	Text with links to italicized text (which links to detailed information under each italicized section	**Why 2-Way Engagement and Involvement?** *Involvement Builds Transparency and Trust* - The public and decision makers are more likely to trust and support a program if they have the opportunity to discuss program development options and issues before decisions are made. - Meaningful involvement increases program transparency and accountability— two critical factors in building public trust. *No Surprises* - Decision makers (especially elected officials) don't like surprises. They want to "see the light before they feel the heat" Forester Media, 2015. *Reveal Concerns and Tolerance Levels Early* - Engaging with the public and decision makers early enables your program to identify issues of concern that should be addressed. - Community members often can offer local knowledge and expertise that help make your program plan better and more responsive. - Early involvement can help you determine your community's "tolerance level" for stormwater fees or other dedicated funding. *Identify Opinion Leaders and "Champions" Early* - It also helps you identify key concerned individuals or groups who should be consulted before you make design recommendations or decisions. - Early involvement creates opportunities to enlist respected community leaders and decision makers as champions to help build support.
56	text	**1.3.4 Involving the General Public and Stakeholder Groups** Many communities have no standing mechanisms for involving the public, key stakeholders, and/or key decision makers in program planning and implementation. In some cases, communities consult directly with the public and decision makers when specific projects are planned (e.g., siting a stormwater treatment facility), but have no stable public involvement process over time. Having ongoing mechanisms to work with the public yields huge benefits.
57	Text with links to italicized text (which links to detailed information under each italicized section	**Methods for Regular Public and Stakeholder Engagement** Programs should consider creating standing methods for involving the public in program planning as a regular part of the program planning process. Options include: *Standing advisory committees* - These committees are ongoing with a regular cycle of program evaluation and review *Regular listening sessions/briefings* - Listening sessions with key opinion leaders and decision makers help you keep tabs on emerging issues. Many cities host regular listening sessions with key groups like the

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		Chamber of Commerce and neighborhood associations, and offer regular briefings for the City Council. *Regular public meetings* - Many cities host regular, often annual, gatherings to discuss program accomplishments and opportunities, and hear about public concerns. *Websites and social media* - Communities can effectively invite public feedback on plans, policies, and projects through web and social media postings. *Surveys and questionnaires* - Cities often survey customers about their satisfaction with program services (e.g. through bill inserts). Tailored surveys and polling provide a particularly important mechanism for assessing community interests around stormwater management and willingness-to-pay for stormwater services.
58	Text with links to italicized text (which links to detailed information under each italicized section	**Some Advice About Advisory Committees** *Seek Broad Representation* - Advisory committees can help build thoughtful programs and a base of support for funding proposals, but they need to be thoughtfully designed. With help from decision makers and stakeholders, you should identify both potential supporters and opponents to serve on a committee. *Clarify the Roles You Want Your Advisory Group To Play* - Advisory groups can serve different roles. They can be designed to more actively assist in program design and option selection, or act more as a sounding board for ideas and options you and your team generate. Relying on such groups to actively help in program development takes more time but may help you gain more support and benefit from local experience. Setting up more passive advisory groups may take less staff time but yield less "buy-in" and active support. *Short Term or Ongoing?* Many communities only set up advisory committees to operate for a short period immediately before making major program or funding decisions. Communities should consider maintaining these committees as an ongoing mechanism to advise your program. By providing ongoing opportunities for the group to assist program priority setting and design, you'll likely build stronger, more lasting community support and obtain critical input to help fine tune your program over time.
59	text	**Other Keys To Success In Involving the Public** In looking for opportunities to speak to community groups and leaders, seek out potential opponents early to better understand their concerns, show your concern for their interests, and hopefully reduce opposition by addressing their concerns in your program design. We recommend engaging 1 on 1 with known local opinion leaders and decision makers to help identify key program and funding issues, and key people to get involved.

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		Using public meetings or hearings alone to involve the public is unlikely to make the public feel their views are genuinely valued. Unless you are careful in meeting planning, tax and fee opponents may be more likely to come to public meetings than proponents. Holding public hearings immediately before you seek funding approval is probably too late to be meaningful, is perceived by the public as empty "window dressing", and is more likely to attract opposition than support. If you do hold public meetings or hearings, make sure your supporters know about them and participate to help advocate for your program.
60		**1.3.5 Case Study: Raleigh, NC's Stakeholder Involvement Process** Raleigh, NC implemented a formal, consensus-based stakeholder process designed by a professional that led participants through a series of analyses and discussions about stormwater fees that resulted in consensus recommendations. Formation of the stakeholder group was approved by the City Council up front. The group was comprised of 25-30 participants representing the development community, environmental groups, the real estate industry, neighborhood groups, and schools.
61		**How Did Raleigh Structure Its Committee Process?** The stakeholder group held 8 meetings between October 2002-February 2003, structured as follows: Table format below 1. Reviewed existing program, funding status and options, and the role of the group. City staff discussed why improvements in stormwater management were needed in Raleigh. 2. Discussed current program level of service and distributed a take-home questionnaire to solicit stakeholder feedback on desired levels of service. 3. Reviewed Charlotte-Mecklenburg County, NC's successful program, and a local case study of stormwater issues and opportunities in the Mine Creek Basin; discussed feedback from the survey distributed in previous meeting about potential levels of service. 4. Field trip to view several successful stormwater control infrastructure projects. 5. Discussed stakeholder reactions to the field trip. Members voted in an exercise to identify preferred service levels for each area of the program. The group now began discussing various funding options including taxes, service districts, special assessments, and a dedicated fee. 6. Discussed funding options and residential and non-residential rate structure options. 7. Discussed residential and non-residential rate structure options and credit options. 8. Finalized recommendations to City Council to form a utility and collect dedicated fees based on a tiered fee structure. All committee members spoke on behalf of the proposal before the Council.
62	Text	**Raleigh's Other Outreach Efforts** In addition to the stakeholder committee, Raleigh's team held at least 10 public meetings, distributed information about the program in water bills, met individually with various citizen action groups, and invited newspaper staff to sit in on stakeholder group meetings. Participants indicated that the robust advisory committee structure and process were critical to the successful adoption of the utility/fee proposal by the Council. (Source, EPA, 2013)
63	Text with links to italicized	**Lessons Learned from Raleigh's Approach** Raleigh's success in obtaining approval of its utility and fee proposal through use of an advisory committee illustrates some key lessons.

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	text (which links to detailed information under each italicized section	*Focus First On Program Needs Before Looking at Fees* - The group first established the need for improvements in stormwater program services before focusing on potential fee designs. *Hear From Your Neighbors* - Raleigh built local support in part by hearing from neighboring jurisdictions that had already gone successfully through the planning process. *Look At Real Project Successes* - Taking the time to visit stormwater management projects and seeing first-hand the benefits these projects provide helped build support and momentum. *Have Committee Members Speak to the Decision-Makers* - When it came time to present the utility-fee proposal to the City Council, committee members talked directly to council members. The City found this approach more persuasive than leaving the briefings to city staff.
64	Text	**1.3.6 Attracting and Involving Program "Champions"** The public (and their elected representatives) may not immediately trust local program managers when they discuss program development and financial needs. A proven strategy to help build trust in the local program is to identify, develop, and creating specific roles in your planning processes for interested program champions from outside your program.
65	Text with links to italicized text (which links to detailed information under each italicized section	**How Can Program Champions Help You?** There are 3 main types of program champions that can greatly support your efforts: *Trusted local leaders* - In many communities, the public may be more inclined to "believe" already established opinion leaders (e.g., high profile business owners, political activists, educators, religious leaders) than they are to believe city staff or elected officials. *Trusted experts* - Some communities have successfully enlisted people with acknowledged expertise in stormwater management to help build support (e.g. university researchers, leaders of successful programs in neighboring communities, and experienced consultants) *Elected officials* - It can make a huge difference to identify early supporters among key elected officials who must approve stormwater funding plans. Identifying 1-2 key officials early in the process and asking them to help persuade the public and fellow elected officials is a key to success.
66	Text with table	**1.3.7 When Are More or Less Intensive Public Involvement Efforts Needed?** How can you determine how much effort you should expend on public outreach and involvement? Based on surveys of communities that engaged in stormwater program and financial planning, several key factors should be considered: <u>Table Below</u> <table><tr><td>**More Intensive Effort Needed**</td><td>**Less Intensive Efforts Needed**</td></tr></table>

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		Stormwater issues are complex and solutions unclear	Program drivers and solutions are relatively simp and straightforward
		Substantial new funding needed compared to current	Modest additional funding needs
		Fees would substantially change who funds program	Little likely change in who would bear funding burden
		No or few nearby examples of successful fee campaigns (easier to follow than lead)	Several examples of successful stormwater fees i neighboring communities
		High likelihood of opposition; organized anti-tax/fee groups active	Little organized opposition likely
		Decisionmakers unfamiliar with stormwater services and needs	Decisionmakers understand stormwater as a priority
		Community has little awareness of water issues and opportunities	Community highly values clean water and need fo stormwater services

Subchapter 1.4: Get Ready To Implement

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67	Subchapter heading	**1.4: Get Ready to Implement** This section discusses the benefits of working with neighboring jurisdictions and outside expert consultants to assist your planning of a sustainable financial portfolio. • 1.4.1 Learning From and Partnering With Your Peers (jump to slide X) • 1.4.2: Assemble Your Team (jump to slide y) • 1.4.3 Transitioning To Your Funding Campaign—Time For Action ! (jump to slide z)
68	Text	**1.4.1: Learning From and Partnering With Your Peers** In addition to obtaining training through modules like this and reading guidance documents, probably the most efficient way to learn how to be successful in program development and financial planning is to learn from your peers. It is particularly important to understand the experiences of stormwater programs in neighboring jurisdictions. The public and decision makers will usually want to know about how stormwater programs work nearby. *A stormwater fee proposal is much more likely to succeed if neighboring jurisdictions have already adopted something similar in scope, amount, and design.*
69	Text with links to italicized text (which links to detailed	**What Can You Learn From Your Peers?** *What Their Stormwater Programs Address* - Core activities and projects, and innovative approaches, included in their stormwater programs *How They Pay For It*

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	information under each italicized section	- Program costs and funding solutions they use now (including fee programs) *Details in Fee Program Design* - Neighbors can provide crucial information about how much they charge in dedicated fees, how they divide fees among different property types, and how they were able to build support for their fee programs.
70	Text with links to italicized text (which links to detailed information under each italicized section	**The Benefits of Partnering With Your Neighbors** Working with and obtaining assistance from nearby peers also provides the opportunity to build *partnerships* that can help improve the viability and efficiency of a stormwater utility: *Easier to Join Than to Invent* - Decisionmakers will often support joining an existing utility or fee program more than setting up an independent one from scratch. *Share Functions Across Jurisdictions* - Setting up a single utility to serve several jurisdictions (or sharing particular services across jurisdictions (e.g. billing or inspection services) is often more cost-effective than going it alone. *Reduce Concerns About Bearing an Unfair Share of the Burden* - Partnering with upstream or downstream jurisdictions may reduce local concerns about your program having to unfairly pay to fix problems caused upstream, or pay for work whose benefit is only experienced downstream.
71	Text	**1.4.2: Assemble Your Team** **Invest Sufficient Resources To Get the Job Done** Program and financial planning take significant time and effort. One of the most commonly cited reasons for failure in funding initiatives is providing insufficient resources for the effort (Forester Media, 2015)
72	Text with links to italicized text (which links to detailed information under each italicized section	**Who Needs to Be On Your Team?** Local programs should identify who specifically will be assigned to work on program and financial planning, public outreach and involvement, and other elements of the process: *Project leaders* - It is critical to define a clear line of responsibility from senior managers to lower level managers to involved staff. *Project staff* - It is best to involve staff from each program with a stake in the outcome *Outside champions* - Include the people from outside organizations you've enlisted to help explain the program and build support *Outside consultants*

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		- You may need to bring in outside help o provide expert advice, assess costs and funding options, develop public outreach and marketing approaches, and facilitate public and advisory group meetings.
73	Text	**Do You Need a Hand?** Stormwater program staff often have insufficient time and experience to be able to adequately support both key facets of program and finance planning: - conducting the analysis needed to identify and assess options for future program priorities and funding approaches, and - organizing, leading, and facilitating public outreach and involvement processes. *You need to be realistic in assessing whether you have sufficient time and expertise in-house to take on long-term program and financial planning.*
74	Text (perhaps table format for bullets)	**How Consultants Can Help** In many cases, rather than do the work with your own staff, it is more cost-effective to enlist the support of outside consultants with wide expertise in stormwater program and financial planning and facilitation. These people can help you: - learn quickly from the experiences of other jurisdictions, - assess your needs and funding options, - survey voters or property owners to assess likelihood of success with a vote, and to determine the funding levels the public might support, - build strategies for building support for your funding plan, - help you engage with the public and key decisionmakers, and - carry out your planning and funding initiative.
75	Text	**Paying For Planning** Paying for program and financial planning can be difficult as there are rarely existing funds earmarked for planning, and it can be difficult to obtain outside funding assistance to aid planning. *However, there are many sources of outside funding for planning.*
76	Text with links to italicized text (which links to detailed information under each italicized section	**Sources of Funding for Stormwater Planning** *State Revolving Funds* - Most State Revolving Funds earmark some funding for planning grants *EPA Grants Administered Through States* - US EPA has several grant programs that, through state agencies, fund stormwater program planning (e.g. Section 319(h) and Section 604(b) grants) *Federal Grants From Other Agencies* - Planning funds are also available through some other federal grant programs (e.g., hazard mitigation planning grants through FEMA to support stormwater program and project planning that help reduce future flooding hazards (see https://www.fema.gov/hazard-mitigation-planning for more information) *State Planning Grants*

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		- Some States (e.g. California and New Hampshire) have grant programs that fund stormwater planning and feasibility analysis efforts (e.g., California's Stormwater Resource Planning grants https://www.waterboards.ca.gov/water_issues/programs/grants_loans/swgp/prop1/) *Local Funding Organizations* - Some communities have obtained special project funds from city councils or other local organizations to pay for program development and planning See, for example, the Mississippi Watershed Management Organization's Planning Grant program (https://www.mwmo.org/grants/stewardship-fund-grants/planning-grants/) *Nonprofits and Foundations* - Nonprofit organizations and foundations sometimes provide seed funding for stormwater program development and financial planning. (See, for example, National Fish and Wildlife Foundation (http://www.nfwf.org/whatwedo/grants/Pages/home.aspx)
77		**1.4.3 Transitioning To Your Funding Campaign—Time For Action!** At this point, if you have implemented the steps recommended so far, you have become well prepared to move to the next phase. Now you are ready to move from initial planning to developing and "selling" your finance plan in earnest. At this point, we recommend you document your work to date, including your: - program plan, - program funding summaries, - outreach and involvement strategies, - planning team, including program staff, outside advocates, and outside experts, and - designed strategies and projected time lines.
78		**Kickoff Time?** If you need to raise the profile of your program needs, you might now kick off your campaign with a splash by arranging media friendly events, to illustrate the need for program improvement. In some cases, based on your initial evaluation of local interests and viewpoints, that it is better to start with a lower profile (so as not to attract attention from potential opponents). Your decision should be based on the feedback you gained from your initial scoping level discussions with decision makers, opinion leaders, and other interested stakeholders.
79		**Summary** This chapter prepares your community to engage in earnest in developing a sustainable funding plan. If you have followed its recommended steps, you have carefully articulated where your program needs to go, why it needs sustainable funding. You have also built a critical base of support for your program among your customers and key opinion leaders. This advanced planning should increase your chances of success in seeking the funding you need.
80		**For Further Information** American Rivers, 2016. When a Band-Aid's Not Enough: IMPLEMENTING STORMWATER UTILITIES IN THE GREAT LAKES BASIN: Community Outreach Tools, Sample Utility Ordinance Language and Guidance for Building Public Support https://s3.amazonaws.com/american-

		rivers-website/wp-ontent/uploads/2016/08/25163628/StormwaterUtilityToolkit_Complete-PDF_3.30.16.pdf Drew, Jason, 2018.. Sifting the Mindset: Are You Ready to Sell Your Program for Funding? Presented at StormCon Expo, August, 2018. EPA 2013. Evaluation of the Role of Public Outreach and Stakeholder Engagement in Stormwater Funding Decisions in New England: Lessons from Communities. EPA-100-K-13-0004, June 2013. https://www.epa.gov/sites/production/files/2015-09/documents/eval-sw-funding-new-england.pdf Environmental Finance Center, 2014. Local Government Stormwater Financing Manual: A Process for Program Reform. Environmental Finance Center, University of Maryland, January 2014. https://efc.umd.edu/assets/efc_stormwater_financing_manual_final_(1).pdf Forester Media, 2015. Stormwater Funding: Successfully Establishing a Stormwater Management Utility. https://foresternetwork.com/free-reports/stormwater-solutions-funding-successfully-establishing-stormwater-management-utility/ Horsley Witten Group. 2011. Sustainable Stormwater Funding Evaluation for the Upper Charles River Communities of Bellingham, Franklin and Milford, MA. Prepared for US EPA Region 1. September 30. Full document: http://www.epa.gov/region1/npdes/charlesriver/pdfs/20110930-SWUtilityReport.pdf, Fact Sheet: http://www.epa.gov/region1/npdes/charlesriver/pdfs/20111019-UtilityProjectGPFactSheet.pdf Horsley Witten Group, 2015. A Quick Reference for Defining and Funding Your Municipal Stormwater Program, June, 2015. Prepared for Merrimack Valley Stormwater Collaborative. http://www.merrimackvalleystormwater.org/wp-content/uploads/2015/01/MVPC-Guide-to-Defining-Funding-SW-Program-2.pdf Kaspersen, 2000. The Stormwater Utility: Will It Work in Your Community? Stormwater magazine. 12http://www.stormh2o.com/SW/Articles/The_Stormwater_Utility_Will_It_Work_in_Your_Commun_212.aspx Metropolitan Area Planning Council (MAPC). 2014. Stormwater Financing/Utility Starter Kit (Draft). Prepared for: The 101 Cities and Towns of Greater Boston. March 23. http://www.mapc.org/Stormwater_Financing National Association of Flood and Stormwater Management Agencies (NAFSMA). 2006. Guidance for Municipal Stormwater Funding. Prepared under grant by Environmental Protection Agency. January, 2006. http://water.epa.gov/polwaste/nps/upload/Guidance-Manual-Version-2X-2.pdf NRDC, 2018. MAKING IT RAIN: EFFECTIVE STORMWATER FEES CAN CREATE JOBS, BUILD INFRASTRUCTURE, AND DRIVE INVESTMENT IN LOCAL COMMUNITIES. APRIL 2018

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